

# Exhibit 4

1           Q.    Was JP, Caryn's mentor?

2           A.    Yes.

3           Q.    Did you assign JP as Caryn's mentor?

4           A.    My recollection is when I came in, one of  
5           the concerns I did have was that Caryn did not have  
6           experience. I mean, she had no idea, you know,  
7           starting from A, she had no idea about what we did as  
8           a defender office. So I was concerned about that,  
9           and I knew she needed somebody to at least show her  
10           the ropes.

11           Basically, you know, review how motions are  
12           drafted, you know, talk about the judges, procedures,  
13           how we handle cases, what is the office about. Just  
14           someone, and I thought JP was the perfect person,  
15           because first, I'm always talking to him, his office  
16           was next to me. We were always communicating, and I  
17           could keep tabs on her and make sure she was okay and  
18           growing through him, vicariously through him, without  
19           having to directly do that, because that takes a lot  
20           of time.

21           Q.    So whose idea was it to have Caryn assigned  
22           to JP?

23           A.    My recollection is it was my idea for the  
24           reasons I just articulated.

25           Q.    It was your idea. And were other people

1           A.    In the Chapter IX process, no, I didn't,  
2           no.

3           Q.    Okay.

4           A.    I might have been investigated, but no, I  
5           don't know.

6           Q.    So you did not feel that you were an  
7           accused party in Caryn's Chapter IX report of  
8           wrongful conduct?

9           MS. WESTMORELAND: Objection to form.

10          A.    Yeah, you mean when she filed?

11          Q.    Yes. When she filed.

12          A.    I was -- I might have read something like  
13           that, but I don't have any recollection of that.

14          Q.    Do you think you read her filing?

15          MS. WESTMORELAND: Objection to form.

16          A.    I might have read some filing. There were  
17           many filings, there were several filings that she  
18           filed, and I would read them quickly, but I wasn't  
19           engaged. When the process started, I wasn't as  
20           engaged in the process. I was engaged to the extent  
21           that I was trying to protect her, and protecting her,  
22           granting her telework, granting all the sick leave,  
23           convert it to administrative leave, all that. But in  
24           terms of being engaged otherwise, I was not engaged.

25          Q.    So you were engaged in measures that were